

EXHIBIT D

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

ESTATE OF EITAM HENKIN, <i>et al.</i>	:	
	:	
Plaintiffs,	:	
	:	
-against-	:	No. 19-cv-05394-BMC
	:	
KUVEYT TÜRK KATILIM BANKASI A.Ş.,	:	
	:	
Defendant.	:	
	:	

PLAINTIFFS' FIRST SET OF INTERROGATORIES TO KUVEYT TÜRK

Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure, Plaintiffs hereby request that Defendant Kuveyt Türk Katilim Bankasi A.Ş. ("Kuveyt Türk" or "Defendant") answer the following Interrogatories, in accordance with the definitions and instructions set forth below, on or before March 24, 2025, per the governing Case Management Plan (Dkt. No. 73-1).

INSTRUCTIONS

1. Kuveyt Türk shall respond to these Interrogatories consistent with Federal Rule of Civil Procedure 33(b).
2. If Kuveyt Türk objects to any part of an Interrogatory, it shall set forth the basis for its objection and respond to all parts of the Interrogatory to which it does not object.
3. Pursuant to Rule 26(e) of the Federal Rules of Civil Procedure, these Interrogatories shall be deemed to be continuing in nature so that if Defendant, its directors, officers, employees, agents, or any person acting, or purporting to act, on its behalf subsequently discovers or obtains possession, custody or control of any information responsive to one or more of these Interrogatories, Defendant shall promptly supplement its response to each such Interrogatory.

4. For purposes of interpreting or construing the scope of these Interrogatories, the terms used shall be given the most expansive and inclusive interpretation, unless otherwise specifically limited in the Interrogatory.

5. The following constructions should be applied whenever necessary to ensure the provision of any information that might otherwise be construed to be outside the scope of an Interrogatory:

- a. Construing the term “including” to mean “including but not limited to”;
- b. Construing the singular form of any word to include the plural and the plural form to include the singular;
- c. Construing the past tense of the verb to include the present tense and the present tense to include the past tense; and
- d. Construing negative terms to include the positive and vice versa.

DEFINITIONS

As used herein, the following terms are defined as follows:

1. “You,” “your,” “Defendant,” or “Kuveyt Türk” refers to Defendant Kuveyt Türk Katilim Bankasi A.Ş. including all divisions, subdivisions, units, parents, subsidiaries, and affiliates, and to all Persons acting or purporting to act on Kuveyt Türk’s behalf, including employees, supervisors, managers, executives, board members, officers, directors, agents, and contractors.
2. “And/Or” is synonymous with the definition contained in Local Rule 26.3 of the Local Rules.
3. “All/Any/Each” is synonymous with the definition contained in Local Rule 26.3 of the Local Rules.

4. “Number” is synonymous with the definition contained in Local Rule 26.3 of the Local Rules.

INTERROGATORIES

1. List each U.S.-dollar denominated correspondent banking account Kuveyt Türk held during the period January 1, 2012, to March 31, 2019, including dates the account was open during that period, bank and branch where the correspondent account was held, and the account number.

Dated: February 6, 2025

Respectfully Submitted,

/s/ Michael A. Petrino

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CERTIFICATE OF SERVICE

I hereby certify that on February 6, 2025, a true copy of the foregoing document was served on counsel of record for Defendant by email as set forth below:

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